

Juanita R. Brooks (CA SBN 75934)
brooks@fr.com
Jason W. Wolff (CA SBN 215819)
wolff@fr.com
FISH & RICHARDSON P.C.
12860 El Camino Real, Ste. 400
San Diego, CA 92130
Tel.: (858) 678-5070
Fax: (858) 678-5099

*Additional counsel listed on
signature page*

Attorneys for Plaintiff
FINJAN LLC

DUANE MORRIS LLP
D. Stuart Bartow (SBN 233107)
Email: DSBartow@duanemorris.com
Nicole E. Grigg (SBN 307733)
Email: NEGrigg@duanemorris.com
2475 Hanover Street
Palo Alto, CA 94304-1194
Tel.: 650.847.4150
Fax: 650.847.4151

*Additional counsel listed on
signature page*

Attorneys for Defendant
SONICWALL, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN LLC, a Delaware Limited Liability
Company,

Plaintiff,

v.

SONICWALL, INC., a Delaware
Corporation,

Defendant.

Case No. 5:17-cv-04467-BLF (VKD)

**JOINT MOTION AND ~~PROPOSED~~ ORDER
TO EXTEND TIME FOR SUBMISSION OF
DEPOSITION DESIGNATIONS**

1 Plaintiff Finjan LLC (“Finjan”) and Defendant SonicWall, Inc. (“SonicWall”) (collectively,
 2 “the Parties”), respectfully move the Court to extend the time by which the Parties are required to
 3 submit deposition designations.

4 Trial in this matter is scheduled to begin on Monday, May 3, 2021, and the final pretrial
 5 conference is set for Thursday, March 18, 2021. D.I. 48. The Court’s Standing Order requires the
 6 Parties to submit a Joint Pretrial Statement and Order in this matter by March 4, 2021, at least 14
 7 days before the final pretrial conference. The Court’s Standing order also requires the Joint Pretrial
 8 Statement and Order to include “deposition excerpts to be offered at trial.” In order to reduce the
 9 likelihood of the Parties designating, responding to, and objecting to deposition testimony that may
 10 become superfluous as the Parties crystallize their respective trial strategies, the Parties respectfully
 11 request that Court permit deposition designations in this matter to be exchanged as follows:
 12

- 13 • The Parties shall exchange opening deposition designations two weeks prior to the
- 14 first day of trial (presently April 19, 2021);
- 15 • The Parties shall exchange counter-designations and objections to opening;
- 16 designations four calendar days after opening designations are exchanged (presently
- 17 April 23, 2021); and
- 18 • The Parties shall exchange objections to counter-designations four calendar days
- 19 after counter-designations are exchanged (presently April 27, 2021).
- 20
- 21

22 The Parties submit that the requested procedure for deposition designations will not impact
 23 the Court’s scheduled trial date or the resolution of any outstanding objections prior to trial, per the
 24 Court’s Standing Order for Civil Trials.

Respectfully submitted,

By: /s/ Proshanto Mukherji

Juanita R. Brooks (CA SBN 75934)

brooks@fr.com

Jason W. Wolff (CA SBN 215819)

wolff@fr.com

FISH & RICHARDSON P.C.

12860 El Camino Real, Ste. 400

San Diego, CA 92130

Telephone: (858) 678-5070

Proshanto Mukherji (*Pro Hac Vice*)

mukherji@fr.com

FISH & RICHARDSON P.C.

One Marina Park Drive

Boston, MA 02210

Telephone: (617) 542-5070

Robert Courtney (CA SNB 248392)

courtney@fr.com

FISH & RICHARDSON P.C.

3200 RBC Plaza

60 South Sixth Street

Minneapolis, MN 55402

Telephone: (612) 335-5070

Attorneys for Plaintiff

FINJAN LLC

Dated: February 1, 2021

Respectfully submitted,

By: /s/ Alice Snedeker

Matthew C. Gaudet (*Pro Hac Vice*)

mcgaudet@duanemorris.com

David C. Dotson (*Pro Hac Vice*)

dcdotson@duanemorris.com

Jennifer H. Forte (*Pro Hac Vice*)

jhforte@duanemorris.com

Alice E. Snedeker (*Pro Hac Vice*)

aesnedeker@duanemorris.com

DUANE MORRIS LLP

1075 Peachtree NE, Suite 2000

Atlanta, GA 30309-3929

Telephone: 404.253.6900

D. Stuart Bartow (SBN 233107)

Email: DSBartow@duanemorris.com

Nicole E. Grigg (SBN 307733)

Email: NEGrigg@duanemorris.com

DUANE MORRIS LLP

2475 Hanover Street

Palo Alto, CA 94304-1194

Telephone: 650.847.4150

Joseph A. Powers (*Pro Hac Vice*)

Email: japowers@duanemorris.com

Jarrad M. Gunther (*Pro Hac Vice*)

Email: jmgunther@duanemorris.com

DUANE MORRIS LLP

30 South 17th Street

Philadelphia, PA 19103

Telephone: 215.979.1000

Attorneys for Defendant

SONICWALL, INC.

[PROPOSED] ORDER

Pursuant to Parties' Stipulated Request, the schedule is changed as follows:

Event	Current Deadline	New Deadline
Deadline to file Joint Pretrial Statement & Order (excluding deposition designations)	March 4, 2021	No change
Final pretrial conference	March 18, 2021	No change
Exchange opening deposition designations	March 4, 2021	two weeks before start of trial (presently April 19, 2021)
Exchange counter-designations and objections to opening designations	March 4, 2021	four calendar days after opening designations (presently April 23, 2021)
Deadline to file pretrial briefs	April 26, 2021	No change
Objections to counter-designations	March 4, 2021	four calendar days after counter-designations (presently April 27, 2021)
Trial	May 3, 2021	No change

IT IS SO ORDERED.

Dated: February 2, 2021


 JUDGE BETH LABSON FREEMAN
 United States District Court Judge